dollars and personnel, to develop an understanding of Ameritech business rules, interface specifications, and operational procedures which ultimately results in lost dollars and opportunity for all CLECs attempting to enter the local service market on a national basis. Ameritech's focus has been on expediting its own ability to gain access to the interLATA market rather than on facilitating real local competition within its region. What you see at this critical point and what you will actually get in a real competitive operating environment are not necessarily the same. Once Ameritech gains in-region interLATA certification, it will no longer have the same incentive to resolve the problems its competitors are having in entering the local market. As a case in point, the Unbundling Service Ordering Guides and the Resale Services Ordering Guide, as referenced in the affidavits of both Mr. Rogers (paragraphs 12 and 13) and Mr. Meixner (paragraphs 8 to 14), were not provided to Sprint in any manner other than as supporting documentation in the Illinois proceeding. This information had previously been requested by Sprint, as well as other CLECs, for both the resale and unbundled processes, in an effort to gain enough understanding of Ameritech's business processes to develop effective electronic interface solutions. The timing and method of providing this information indicates that the guides were not developed to meet the needs of their CLEC customers, but in support of Ameritech's 271 applications. (See Attachment A, page 129) Time and resources could be better spent by all parties if the focus was on actually giving Michigan consumers a "real" competitive choice for the provision of their local service rather than continuing the burdensome task of re-evaluating Ameritech's OSS functionality that has not significantly changed since early January.

These same interfaces were evaluated by the Wisconsin Public Service Commission, which very quickly determined that Ameritech could not prove either the reliability of the interfaces or their parity to Ameritech's retail service. Wisconsin has developed a list of criteria that Ameritech must be able to meet/demonstrate before it can again request a hearing from that Commission on the compliance of its OSS systems with the checklist requirements, thereby avoiding the continued waste of time and resources better utilized in supporting the introduction of true local service competition. (See Attachment B, Appendix B)

Requirements for Parity of Access to OSS Interfaces

18. In order to establish parity of access, Ameritech must demonstrate that its OSS interfaces provide: (1) equivalence of information availability; (2) equivalence of information accuracy; and (3) equivalence of information timeliness. Ameritech has apparently agreed with this definition of parity since it has agreed to measure its performance for these exact parameters both in previously filed testimony, as well as in contracts with both AT&T and Sprint. Equivalent information availability means that Ameritech must deliver to the CLEC, to no lesser a degree than it does for its own operations, all data necessary to support a specific transaction. Equivalent information accuracy requires that the information exchange pass three critical tests: (1) it must comply with an agreed- upon data format and structure, documented and clearly understood by both/all parties to the transaction; (2) there must be agreed-upon business rules for interaction between the

parties; and (3) there must be demonstrated end-to-end transaction integrity, including load capacity testing. An interface that operates satisfactorily at low volume but chokes under a volume or capacity test designed to mirror an actual operational environment with potentially high market volumes, or when processing input from multiple CLEC entry points simultaneously, will place all new entrants at a distinct competitive disadvantage relative to Ameritech. Ameritech does not utilize these proposed interfaces for its own local service provisioning today and it has not yet proven its ability to provide operational parity to its competitors. (See Attachment A, page 66)

19. The systems proposed by Ameritech do not meet the parity tests of the Telecommunications Act of 1996 because they are not currently deployed for widespread CLEC use. Any use of these interfaces has been limited at best and the majority of them have been undergoing design changes throughout 1996 and the 1st quarter of 1997. All the specifications that have been provided to Sprint have dealt with total service resale and no specifications or implementation meetings have been held between Ameritech and Sprint to address the ordering and provisioning of unbundled elements.

20. Per Ameritech's affidavits and the unbundled service ordering guides it recently provided to CLECs, Ameritech plans to use the existing access service request ("ASR") format and access billing systems for ordering and provisioning of unbundled elements. These systems and processes were designed for access purposes and are not the industry's recommended solution for ordering and provisioning of local unbundled elements. While Ameritech may in fact be using these systems for interface with some CLECs/CAPs today, the processes

they support pre-date the 1996 FCC decisions and were not designed to support unbundled elements as they are currently defined. Per paragraph 9 of Mr. Rogers' affidavit, Bellcore has offered to work with Ameritech to revise its processes and documentation to support the industry's Local Service Ordering Guidelines ("LSOG") published on December 2, 1996, which are the current industry standards for local service requests ("LSR"). Ameritech must develop a timeline for implementation of these industry standards, as negotiated in our 1997 interconnection agreement, prior to Sprint's implementation of UNE-based services.

21. Furthermore, Ameritech's interfaces do not always adhere to industry standards. When systems are used for purposes other than those intended in their original design, they must be modified and/or refined to meet the new needs. Modifying and redefining systems that have previously been deployed and which are currently operational with other companies requires coordination of both the system design as well as the associated business rules. No company, including Ameritech, can arbitrarily redefine industry accepted standards without negatively impacting the users of these systems and interfaces. Contrary to Ameritech's contentions, its OSS interface solutions do not always adhere to industry standards. There are in fact numerous cases where Ameritech has essentially over-ridden industry standards and developed or imposed an Ameritech requirement or definition. Mr. Rogers' affidavit at paragraph 9, is misleading when he indicates that Bellcore mapped Ameritech's specifications to industry guidelines and confirmed that Ameritech's specifications accurately reflect industry guidelines for service ordering, billing and resale usage, trouble administration, end office integration, and unbundled loop provisioning. Ameritech's

specifications were loosely developed based on industry standards for access service, not local service. For example, Ameritech utilized the Customer Service Guidelines, Issue 5 for mapping the population of the EDI records for their Electronic Service Ordering ("ESO") Guideline, Version 3.2; although Ameritech witness Rogers references Issue 7 in his affidavit, Ameritech did not in fact vote with the CLEC community to accept Issue 7 for deployment at the most recent industry meeting.

22. If Ameritech utilized the LSOG as a basis for the development of its service ordering functionality, it has not been able to share these concepts which might have reduced the number of rejects currently being experienced by CLECs testing this application. Ameritech's AEBS bill may be based on a CABS format but is in fact a separate billing system unique to Ameritech designed to support local resale services. As stated previously, the industry standard enhancements required to make this access interface useable in the local service arena have not yet been finalized. The current standards for the ordering of unbundled elements should also be based on LSOG guidelines requiring the use of an LSR, not the ASR currently supported by Ameritech's interface. Ameritech's customized approach to systems development has complicated market entry for many of the CLECs who wish to enter the local market as national competitors.

Ameritech's Position on Operational Interfaces Adversely Impacts Sprint's Local Market Entry

23. Sprint requires the development and deployment of industry standard electronic interfaces for access to ILEC operational systems. The FCC requires the ILEC to provide

nondiscriminatory, automated operational support systems to enable new entrants access to pre-order, order, installation, provisioning, and repair services as well as the ability to assign numbers, monitor network stations (maintenance), and bill local service to their end user customers. (Interconnection Order, 11 FCC Rcd at 15763-68, paragraphs 516-528) The FCC also has encouraged the development of national standards. (Interconnection Order, *Second Order on Reconsideration*, 5 Comm. Reg. (P&F) 420, 424 ¶ 13 (1996)) Ameritech provided CLECs with specifications in 1996 for several interfaces intended to provide access into Ameritech's systems and processes; however, they are not industry standard interfaces. Sprint is currently reviewing Ameritech's specifications, as well as continuing to work with other CLECs and ILECs, in an effort to support the establishment of industry standards for interfaces that can be used across the country by all ILECs and competitors for effective local market entry and data exchange. Sprint cannot support the development of customized interfaces with each ILEC, as Ameritech has attempted. The time and resources required to support this type of ILEC-specific interface would be crippling to Sprint's market entry.

24. Sprint requested and won an arbitration decision that guarantees Sprint the right, at least for an interim period, to interface with Ameritech using manual interfaces. At the time of our arbitration, we were not aware of how much of Ameritech's CLEC interfaces and internal procedures still relied on manual processes. Realizing that manual activity is both burdensome and error-prone, Ameritech must develop and implement industry standard interfaces. Sprint was surprised to learn from Ameritech's recent testimony in the

Michigan Public Service Commission's Section 271 case (See Attachment A, pp. 48-49) that Ameritech may, by state tariff, limit the availability of manual interface. Sprint is in the process of attempting to obtain this new Ameritech Michigan tariff to determine whether this tariff undermines both the Michigan arbitration decision (Attachment C) and Sprint's interconnection agreement with Ameritech. Limiting manual interfaces could adversely affect Sprint's market entry and the market entry of many other CLECs. True local competition will not exist until CLECs are able to consistently interface with ILECs in a consistent and nondiscriminatory manner.

MFN Issue

25. For the first time, Ameritech has acknowledged that CLECs have an independent right through Section 252(i) to obtain provisions from another approved interconnection agreement. (Brief at page 16 and 17) In fact, in his affidavit (at page 12, paragraph 22), Mr. Mickens states that: "As additional or different [interconnection] benchmarks are established . . . they will become available to . . . any other interconnecting carriers through the MFN clauses in their agreements." However, as demonstrated in Sprint's arbitration, Ameritech has not previously subscribed to this view. The Michigan Arbitration Panel concluded that "Sprint's proposed [MFN] language should not be incorporated into the contract, but that both parties should be left free to pursue their respective positions concerning more favorable terms reached by other parties with Ameritech, should that occur." See Attachment C, pages 20-23 of the December 16, 1996

Decision of the Arbitration Panel in Michigan PSC Case No. U-11203. This decision was based on the Michigan PSC's Order in the AT&T arbitration with Ameritech. In that arbitration, AT&T argued for a broad MFN provision and Ameritech asserted that "AT&T must adopt the terms and conditions of an entire interconnection, service, or network element arrangement in another agreement as a package." In the alternative, Ameritech argued that the Commission could adopt neither party's language and allow them to pursue their differing interpretations of Section 252(i). The Michigan PSC held as follows: "The Commission is persuaded that Ameritech Michigan's alternative resolution of this issue is appropriate and should be adopted. The proper interpretation of Section 252(i) of the FTA is a major issue that does not need to be addressed at this time." See Attachment D, pages 12-13 of the Michigan PSC November 26, 1996 Order in Case Nos. 11151 and 11152. Mr. Edwards' affidavit at paragraphs 14 through 17 deals with MFN clauses which were included in the interconnection agreements of Brooks Fiber, MFS, and TCG. As previously indicated, the Michigan PSC denied both AT&T's and Sprint's requests for an MFN provision in their respective interconnection agreements. However, Ameritech's Brief in support of this Application, page 16 and 17, states that "a carrier may assert its MFN rights by sending Ameritech a letter specifying the rates, terms and conditions relating to an interconnection arrangement, unbundled elements or combination, or resale service in another carrier's approved agreement that the requesting carrier is adding to its agreement." In Ameritech Michigan's Submission of Additional Information, Case No. U-11104, before the Michigan Public Service

Commission, Ameritech made the following statement: "However, even apart from the MFN clause, Ameritech Michigan believes that a CLEC has an independent right under Section 252(i) of the federal Act to obtain item-by-item provisions from another approved agreement. Therefore, even AT&T, which has no MFN clause in its interconnection agreement with Ameritech Michigan, could obtain terms and conditions from another approved agreement." Ameritech has never communicated their willingness to support this provision to Sprint directly. We only became aware of their new position on this issue through review of their 271 application. If in fact Ameritech intends to honor this commitment, Sprint will avail itself of this opportunity when and if necessary.

Summary

26. The mere fact that Ameritech has provided specifications for electronic interfaces does not guarantee that they actually work or that they will in fact provide parity in performance to Ameritech's internal systems. Timely access to customer information, service establishment, and trouble resolution will determine the ultimate success or failure of any competitor. Especially in a resale mode, the quality of the product that Sprint will be able to offer its end user customers is directly dependent on the quality of Ameritech's services. Actual implementation of operational interfaces between Sprint and Ameritech will be a complex and detailed procedure. Until Ameritech's proposed operational interfaces have been implemented and are actually working in practice, Sprint will not know whether they

meet Sprint's requirements or, for that matter, the requirements of the Act and the FCC. This concern is further validated by the testimony and documented test results of other CLECs actually using these OSS interfaces in Michigan. (Transcript of OSS Hearings, MPSC #U-11104 (May 28, 1997))

27. Until Ameritech's proposed operational interfaces have been implemented and are actually working in practice, it is impossible for Sprint to determine whether Ameritech is providing performance parity or meeting the requirements of the Telecommunications Act of 1996. ILECs such as Ameritech currently have all the systems and support processes in place necessary to offer interLATA service and will be able to do so from the date they receive in-region certification. There are multiple vendors ready and willing to provide the ILECs interLATA transport services at competitive rates. Unlike CLECs, the ILECs will not suffer the repercussions and delays involved in attempting to enter a monopoly market controlled by a single vendor. Supporting Ameritech's efforts to gain in-region certification before competition truly exists in the Michigan local market defeats the ultimate purpose of deregulation and may prevent the purpose of the 1996 Telecommunications Act from being fully realized.

Betty L. Reeves

Subscribed and sworn to before me this 10th day of June 1997.

My Commission Expires:

Notary Public in and for said County and State

SALLY J. WERTS
Notary Public - Notary Seal
STATE OF MISSOURI
Clay County
My Commission Expires: Oct. 2, 2000

ATTACHMENT A

STATE OF MICHIGAN

BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

In the matter, on the Commission's own motion, to consider Ameritech Michigan's compliance with the competitive checklist in Section 271 of the Telecommunications Act of 1996 Case No. U-11104

_____/

Proceedings had in the above-entitled matter before Theodora M. Mace, J.D., Administrative Law Judge, at the Michigan Public Service Commission, 6545 Mercantile Way, Lansing, Michigan on Wednesday, May 28, 1997.

PRESENT:

JOHN G. STRAND, Chairman
JOHN C. SHEA, Commissioner
DAVID SVANDA, Commissioner

ALSO PRESENT:

Ann Schneidewind
William Celio

Members of the Communications Division, Michigan Public Service Commission Staff

APPEARANCES:

CRAIG ANDERSON, J.D.
JOHN M. DEMPSEY, J.D.
Room 1750
444 Michigan Avenue, Room 1750
Detroit, Michigan 48226
and
MICHAEL KARSON, J.D.

Appearing on behalf of Ameritech Michigan

January to April, what is the chart showing regionwide?

MR. MICKENS: In terms of volume?

CHAIRMAN STRAND: Yes.

MR. MICKENS: Yes. In fact, if anything, steeper, and we have a chart on that later on.

MS. SCHNEIDEWIND: Mr. Mickens, are you familiar with a tariff proposal that was made by Ameritech Michigan to withdraw all manual interfaces, I believe it was by the end of the year, and if so, is that still Ameritech's proposal?

MR. MICKENS: I have heard of it. I am not familiar with it firsthand. As the operations guy involved in this, I would like it, I'd have to admit, because maintaining the manual processes as the volume grows is very difficult to do and very expensive. But I've not really been involved in it.

MS. SCHNEIDEWIND: But from a CLEC's point of view, especially a new CLEC, didn't you say earlier that they only reach a point volumewise where certain interfaces would become economically viable for them?

MR. MICKENS: Yes. It is again because we offer a manual process in everything that we do. Despite the fact that I think all the pricing is based upon the electronic processes, we do offer the manual processes, and in that situation it costs us more to process the

orders and work the orders, and I understand why that proposal would have been made, but like I said, I've not been involved firsthand in it. I've been on the operations side.

MR. CELIO: Is there someone that can do that? Because I can give you a little refreshment. We've got the tariff, it's in place, it's in your books, or if it's not, it's on the way to being in your books, where you limit the number of manual transactions to like 50 a day or 250 a week or a month up until the end of the year, then they all have to be electronic. What happens at the end of the year if these folks don't have electronic interfaces?

MR. ANDERSON: Mr. Celio, we'll check on that. I think the tariff addresses as to each carrier a 12-month period. I don't believe it's in here, but I will check on that at the break and get an answer for you.

MR. MICKENS: You asked about the volume. We've had sharp increases in volume.

When we started off on this project and entering this marketplace, we were really doing a lot of training and presentations and hand-holding with customers. As the volume has grown and as we have picked up more customers, we have now put in place more documentation.

had some questions during the time.

Anyway, go ahead.

MR. MICKENS: So anyway, 10 seconds was the number that we felt we realistically would meet most of the time, but also we would miss some of the time and did not adversely affect our customer and their ability to serve the retail customer.

MS. SCHNEIDEWIND: But how can I use that kind of a standard to determine whether or not you've met the parity requirements that the Federal Communications Commission has required you meet?

MR. MICKENS: By definition these OSS interfaces are something that the Ameritech retail units don't use. If you take a look at the difference between the time involved, I think it's seconds in the sense that the typical Ameritech retail representative is going to get this type of activity in three or four seconds, the CLEC is going to take eight to 12 seconds, so, you know, we've got about five seconds, less than 10 seconds' difference, and the CLEC has the benefit of -- I think Mr. Rogers indicated that there were something like 72 different interfaces or screens that the Ameritech retail representatives had to work through. The CLECs have seven. So there's a tradeoff, and what they have is a lot easier from a training perspective and a use perspective

important for the Commission to consider both the transmission of the data as well as processing once it receives the data at Ameritech. That downstream processing is not, as Ameritech has suggested, entirely internal to Ameritech and of no concern to CLECs. The DOJ makes it very clear it's of great concern. And I think the performance data that we present here today will explain why that downstream processing affects our ability, AT&T and MCI and LCI's ability to service their customers.

I'll now turn the floor over to Ms. Bryant to give you some background on the OSS interfaces that AT&T has developed and our plans as we move through this year in our continuing development and implementation activities.

MS. SUSAN BRYANT: Thanks, Joan.

I want to start for just a second and kind of give just four points on some history, because you kind of have to start there to understand the development of our systems, I believe.

When we first started on this venture it really related to the Customer First hearing in the Ameritech states, and we were interfacing with Ameritech to discuss our operational interfaces based on a trial that was at the time being proposed for the Grand Rapids

area, as well as the Chicago area.

In those negotiations which transpired in 1995, several issues of this transaction type nature were discussed, and the EDI interface was actually started in our discussions at that time.

In '96, as we all know, the Telecom Act was passed. In February of '96 we officially sent a letter asking to sit down and negotiate under the Act with Ameritech but, recognizing that a number of work activities had already transpired, we asked them to put together an implementation team to continue to work on those operational interfaces and the things that needed to be resolved in order for us to actually get into the market. At the time our marketing plans were to try and get into the market towards the third quarter of '96.

They agreed to do that. And we established those meetings in April of '96. In order to meet our market entry dates, we were coming up on some relatively critical systems development requirement dates. And you have to really understand what you need in order to develop our internal systems. And at that point in time the ruling that came in August had not necessarily been official. So we utilized as much as we could from the data that we gained in those interactive sessions, and we had to make some business decisions somewhere towards

the middle of that year.

Many of those actually drove us to narrow the scope of our product offering when we actually were going to go into the market. At that point in time, in order to gain market entry timelines in the September time frame, we would have at least had to have started testing our system somewhere in the August time frame.

So simultaneous to the work going on with the FCC we were actually having to close on developmental requirements for our internal systems. We did work through that as closely as we could, did make some decisions towards the middle of that year to actually go into the market with what we would call POTS, plain old telephone service, nothing really complicated, basically dial tone with some vertical features. Obviously that's really more conducive to the consumer residential market, as well as some of the smaller end business markets, and that was essentially decided on towards that mid-July, June/July time frame.

We proceeded with our testing plans, and as we continued to negotiate with Ameritech the interfaces, we were putting into place some of our test scenarios.

To kind of give you a sense of the interfaces that we actually have in fact in play,

preordering is manual for us right now, and we are using a manual process to handle the telephone number assignments, the due dates when we have work that needs to be done, and in fact requests for the CSRs, the customer service records.

Ordering at this point is via the EDI Issue 5, which at the time was in fact what we had to develop to. Right now the transactions that we are processing are the migration transactions you heard about earlier, new service transactions, additional line transactions, changes, although those are limited in terms of the volumes that we're sending right now, and then disconnect transactions. Those are the kinds of transactions that we are in fact currently sending.

We are not yet sending deny or restore transactions, complex business services such as PBX, Centrex, DID orders. They are not being transmitted at this point from AT&T, nor are we sending complex directory listing transactions. And right now there is manual ordering transactions you heard about earlier that we are utilizing, and those are the jeopardy transactions where in fact one of the -- if the due date is in jeopardy, they are manually calling us to let us know that.

COMMISSIONER SVANDA: Are your manual operations your choice?

MS. BRYANT: The preordering manual operations actually were negotiated prior to the August decisions or the final ruling. I think our preference would be to actually go towards an electronic interface. We have been negotiating what interface we should use for that period of time, and actually have agreed to meet the EAP interface transaction. So we should be able to mechanize that by the September time frame.

Repair and maintenance is manual, and I would say that is our decision right now, again based on what our interface option was at the time.

Repair and maintenance, as I said, is manual. Billing was EMR up until a month ago when we changed the transaction to more of an EMI format.

I might note that actually was not an announced change ahead of time. We found that out when they actually got the bill to us. That's right now the format that they're using, the EMI.

Testing, time frame from the test, we started our service readiness test in the September time frame for the communications connection, in October for the actual orders to be sent. Service readiness tests are orders that we send based on the types of transactions that we know we have got to support in the marketplace, but they are assigned to our employees. We had a group of

employees that volunteered for us, but they did not choose what they ordered. We had to basically assign for them what it was that they were going to order.

That test was predominantly on Illinois accounts. The SRT for Michigan was in February. So that same type of a test transpired in Michigan in February of this year.

Market readiness testing is again to our internal employees, but at this point we're actually going into some telemarketing efforts. We were making phone calls to them as we would to the normal customers, and we were asking them to pick the offer that they wanted, and we were asking them to make the decisions that is not a contrived scenario. We felt as though that was a little bit more indicative of what the marketplace would bear in terms of the types of transactions that we would actually be sending.

That MRT or market readiness test, for both Michigan and Illinois, started in February of this year. Then we did go into a limited marketing or controlled marketing effort as you heard earlier in March of this year in Michigan. That's the background for you.

MS. MARSH: With that background, unless there's any questions about the OSS that AT&T is actually using, we'll move immediately to the performance data.

Based on comments Ms. Bryant gave, it's obvious that most of our experience is with the ordering interface on resale, and the performance data that we have reflects our experiences for the -- we tried to capture the last seven weeks. We tried to make it as current as possible so it indicates what successes we're having right now and what problems we're continuing to have. I think you can categorize the most serious problems that we are continuing to have right now into four broad categories.

No. 1, we are, as we ramp in Michigan and in Illinois, and as our volumes increase in number, we are experiencing backlog problems and problems with orders that are pending past the Ameritech committed due date, to be distinguished from the due date requested by the CLECs.

As Mr. Celio pointed out earlier, we request a due date based on the standard interval; we don't get the due date. But nonetheless, orders are pending past the commitment Ameritech has provided us. As our volumes go up, that problem is increasing with it.

MR. CELIO: Joan, before you get too far along, AT&T in Michigan is only serving residential customers, right?

MS. MARSH: Correct.

MR. CELIO: And you're only doing that on a resale basis, correct?

MS. MARSH: Correct.

Second, we have significant concerns which both Mr. Connolly will address from a technical standpoint and Ms. Bryant will address from a marketing entry standpoint, with the level of manual intervention that Ameritech continues to rely on in processing the orders once they are received electronically and sent into their downstream systems.

The level is at an unacceptably high rate right now, and it is in fact contributing to some of the delays that we are seeing, and we will discuss our experiences with what's causing that and how that directly links to the delays that we're seeing.

Third, there has been some billing issues on both a wholesale side, the AT&T's wholesale bill has been out of balance, and more importantly as it relates to AT&T's customers, there have been billing errors which relate to customers that have been migrated to AT&T. We are billing them properly, but Ameritech has continued to bill them despite the fact that they have migrated them over to AT&T.

And that is attributed to a disconnect in two of the downstream systems at Ameritech, a problem that they are investigating and resolving, but nonetheless at last count approximately 400 customers were affected by

this problem.

That's 400 AT&T customers who are getting billed twice for the same service.

And finally we have some experiences we'd like to share as it relates to Ameritech's response time and the procedure that we go through with Ameritech in an effort to get our concerns addressed and resolved. We think this is absolutely critical because the primary incentive Ameritech has right now to listen to our concerns and address them is their desire to be entered into the long-distance business.

Those incentives will change if they are allowed in, and then it's unclear to us if these problems will be addressed and resolved in a timely fashion.

I'll now ask Mr. Connolly to present some of the initial performance data. It can be found behind Tab 2 of your binder, starting with the presentation of the charts on the problems that we're having with backlogs and with pending orders that are not being completed in a timely fashion.

MR. CELIO: Are you saying you have 400 people, 400 accounts being double-billed out of the 17,000 or out of how many?

MS. MARSH: The 400 count is based on a regional assessment of all the AT&T customers to date. We